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Lead Local Flood Authority

Amber Willard
Planning and Building Control
Arun District Council
Arun Civic Centre
Maltravers Road
Littlehampton
West Sussex
BN17 5LF

Date 27 November 2025

Dear Amber,

RE: WA/89/25/DOC – Lower Farm, Yapton Lane, Walberton

Thank you for your consultation on the above site, originally received on 20 October 2025 and reviewed 24 November 2025. The application as submitted, contains additional information including responses from ADC. We would like to provide the following update.

The Application refers to the approval of details reserved by condition imposed under WA/65/24/PL relating to conditions 3-surface water drainage, 4-additional surface water run-off and 5- surface water drainage survey (please see WA/90/25/DOC for approval of details reserved by condition 6-Environmental Management Plan and 7-lighting plan, 11-Archaeological works, 13-vehicular access, 14-safeguarding mineral resources, 16-BNG plan-30-year monitoring plan, 17-Construction Environmental Management Plan and 19-statutory Biodiversity Net Gain Plan).

Conditions 3, 4 and 5 are related to surface water drainage and therefore the LLFA will not be commenting on the other conditions within this application as they are outside of the remit of the LLFA.

For reference, Condition 3 is worded as follows:

"Prior to the commencement of development, construction drawings of the surface water drainage network, associated sustainable drainage components and flow control mechanisms and a construction method statement shall be submitted and agreed in writing by the local planning authority. The scheme shall then be constructed as per the agreed drawings, method statement, FRA and Drainage Statement (Drainage Statement, version 1.0, CEP, December 2024) and Drawings and remaining in perpetuity for the lifetime of the development unless agreed in writing by the Local Planning Authority. No alteration to the agreed drainage scheme shall occur without prior written approval from the Local Planning Authority."

Reason: To ensure the flood risk is adequately addressed, not increased and safe for the lifetime of the development in accordance with NPPF and Arun Local Plan policies W SP1, W DM1, W DM2 and W DM3. This is required to be a pre-commencement condition because it is necessary to implement the surface water drainage system prior to commencing any building works.”

For reference, Condition 4 is worded as follows:

“No development, including preparatory works, shall commence until details and method statement of measures indicating how additional surface water run-off from the site will be avoided during the construction works have been submitted to and approved in writing by the Local Planning Authority. The applicant may be required to provide collection, balancing and/or settlement systems for these flows. This should include the maintenance proposals during construction. The site works and construction phases shall thereafter be carried out in accordance with approved method statement, and the approved measures and systems shall be brought into operation before any works to create buildings or hard surfaces commence for the relevant phase.

Reason: To ensure that the development achieves a high standard of sustainability and ensure the flood risk is adequately addressed and not increased in accordance with NPPF and Arun Local Plan policies W SP1, W DM1, W DM2 and W DM3. This is required to be a pre-commencement condition because it is necessary to implement the surface water drainage system prior to commencing any building works.”

For reference, Condition 5 is worded as follows:

“Upon completion of the surface water drainage system, including any SuDS features, and prior to the first use; a survey and report from an independent surveyor shall be submitted to and approved in writing by the Local Planning Authority. The survey and report shall demonstrate that the surface water drainage system has been constructed in accordance with the details approved pursuant to condition 3. Where necessary, details of corrective works to be carried out along with a timetable for their completion, shall be included for approval in writing by the Local Planning Authority. Any corrective works required shall be carried out in accordance with the approved timetable and subsequently re-surveyed with the findings submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure the flood risk is adequately addressed, not increased and safe for the lifetime of the development in accordance with NPPF and Arun Local Plan policies W SP1, W DM1, W DM2 and W DM3. This is required to be a pre-commencement condition because it is necessary to implement the surface water drainage system prior to commencing any building works.”

Following a review of the submitted documentation, we are **unable to recommend the discharge of Conditions 3, 4, and 5 at this stage.**

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Condition 3 - While we acknowledge the significant work and detail provided, the level of application required for discharge must meet the following criteria:

1. Detailed Design at 'For Construction' Status

All drawings and associated documents should be clearly versioned and prepared to a standard suitable for Tender and Construction. This includes:

- Comprehensive **cross-sections of all key SuDS features**.
- Consistency with approved layout plans and compliance with the drainage hierarchy.

2. Discharge off-site must not be increased

The combined discharge must not exceed QBar, therefore the proposed increased discharges for systems 4 & 5 to manage blockages must either be reduced to QBar or off-set by a reduction to one of the other systems draining to the same watercourse.

3. Compliance with National Standards for SuDS (2025)

The submission must demonstrate how the proposed scheme aligns with the updated *National Standards for Sustainable Drainage Systems (SuDS)*, published by DEFRA in July 2025. These standards require:

- Robust water quality treatment measures.
- Integration of amenity and biodiversity benefits within the design.
- Evidence of long-term resilience and adaptability to climate change.

Condition 4 - We have been unable to identify any submitted details addressing the requirement for *“measures indicating how additional surface water run-off from the site will be avoided during the construction works.”* In the absence of this information, we are **unable to recommend discharge of Condition 4.**

To satisfy this condition, the applicant must provide a Construction Phase Surface Water Management Plan or equivalent documentation demonstrating compliance with the approved drainage strategy and relevant standards.

Condition 5 - This is a post-construction verification condition and can only be discharged following completion of the works and submission of as-built information confirming compliance with the approved design. Accordingly, it cannot be discharged alongside pre-commencement conditions.

Until these requirements are met, we conclude that there is **insufficient information to discharge the conditions.**

Informative:

Please note if the LPA decide to grant planning permission, we wish to be notified for our records should there be any subsequent surface water flooding that we may be required to investigate as a result of the new development.

Yours sincerely,

Mat Jackson

Flood Risk Management Team



Annex

The following documents have been reviewed, which have been submitted to support the application;

- CEMP
- Drainage layout dwg 503
- Drainage Maintenance Manual
- Drainage Statement
- Surface Water Management Earthworks

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Arun District Council, Civic Centre, Maltravers Rd
Littlehampton, West Sussex, BN17 5LF
www.arun.gov.uk

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From: Mat Jackson [REDACTED]
Sent: 27 November 2025 10:07
To: Amber Willard <Amber.Willard@arun.gov.uk>; Planning.Responses <Planning.Responses@arun.gov.uk>
Cc: Dominic Henly [REDACTED]
Subject: LLFA Clarification to WA/89/25/DOC Lower Farm, Yapton

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Dear Amber,

It has been noted and brought to my attention that during a period of IT issues on Mastergov and my part, that an incomplete response to the above application had been sent. I apologise for the confusion on my

part. Please take the attached as our current response to the consultation. I took the opportunity to review further some of the documents and offer a bit more targeted advice as to where the insufficient detail had the most significant impacts of our decision. Please can this be uploaded to the portal for the record. I will update Mastergov on our end but you will not receive a further submission.

On a similar theme, during this period of transition between clarification of National SUDS standards and The LLFAs requirements, please feel free to reach out directly if you have any questions.

Kind Regards,

Mat Jackson *FCIWEM C.WEM CEnv CSci LLM MSc BSc (CombHons)*

Senior Flood Risk Management Officer
West Sussex County Council



Certified Carbon Literate



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